

Draft copy to Joesph Joyce/El Toro BRAC
14 August 1996
15 August 1996

Commanding Officer
Naval Facilities Engineering Command
Southwest Division
Mr. Richard Selby, Code 0233.RS
Building 128
1220 Pacific Highway
San Diego, CA 92132-5187

re: Comments regarding - Draft Phase II Feasibility Study Report Operable Unit 2A - Site 24
Marine Corps Air Station, El Toro, California

ref: CTO-0073/0159

Dear Sir;

This letter is submitted to comply with submission of comments during the public comment period for the above referenced document. I perceive a serious problem in the FS Report dated August, 1996. Please note my specific comments are given as an attachment and I suggest these comments warrant a response. The omissions constitute my grounds for recommending that this report be rejected.

The report in its present form is not acceptable.

Yours sincerely,

Charles R. Bennett Ph. D.
Community Member

c:
Joseph Joyce
MCAS El Toro, Commanding General
AC/S Environment, IAU
P.O. Box 95001
MCAS El Toro
Santa Ana, CA 92709-5001

The Honorable Christopher Cox
4000 MacArthur Boulevard
Suite 6500, West Tower
Newport Beach, CA 92660

Marcia Rudolph
26491 Summer Creek
Lake Forest, CA 92630

Bonnie Arthur
U. S. Environmental Protection Agency
Region IX H-9-2
75 Hawthorne Street
San Francisco, CA 94105

Copy to Joesph Joyce/El Toro BRAC
28 February 1996

28 January 1996

Mr. Don Zweifel

Fax: 714 - 937-3240

re: Comments regarding El Toro
OU-2 - Site 24 RI Report
Draft Phase 2

Don;

I perceive a problem in the RI report dated 20 Feb, 1996. Please note the 1,1,2 TCA and/or 1,2 DCA citations on the following pages in the report:

4 - 12
4 - 46
4 - 62
4 - 67
4 - 77
5 - 3
5 - 4

One or both of these compounds has been found in multiple locations in the soil gas analyses, the soil analyses, and the groundwater analyses. Only in the groundwater has its origin been questioned, and concluded to be a sample contamination. This, of course, can (and should) be confirmed in the travel blanks in the full report appendices to determine if their conclusion is substantiated. Yet, this does not close the case.

The chart on page 5 - 3 is not complete, it has no origin for 1,1,2 TCA. Moreover, I would suggest a reference should be provided to substantiate the hypothesis of the conversion of 1,2 DCE to 1,2 DCA. The text (5.1.2) provides no guidance.

* What is the consequence? Rather serious, as the presence of 1,1,2 TCA and/or 1,2 DCA requires another chlorinated hydrocarbon source in addition to PCE and 1,1,1 TCA to have been present. One candidate might be 1,1, 2 TCA that has been there from the beginning, at low levels.

I suggest these comments warrant a response.

Yours sincerely,

Charles R. Bennett Ph. D.
RAB member